UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

STEWART ABRAMSON, individually and)	
on behalf of a class of all persons and entities)	
similarly situated,)	
)	Case No. 7:15-CV-05299-KMK
Plaintiff,)	
)	
v.)	
)	
ALPHA GAS AND ELECTRIC, LLC)	
)	
Defendant.)	
)	

MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT AND CONDITIONAL CERTIFICATION OF CLASS AND ENTRY OF SCHEDULING ORDER

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, the plaintiff respectfully moves the Court to preliminarily approve the settlement of this putative class action, to certify the class for settlement purposes only, and to set a scheduling order. For the reasons, discussed at length in the accompanying Memorandum of Law, the motion should be granted.

Dated: September 30, 2016 Respectfully submitted,

/s/Matthew P. McCue

Matthew P. McCue, Esq.
The Law Office of Matthew P. McCue
1 South Avenue, Suite 3
Natick, MA 01760
(508) 655-1415
(508) 319-3077 facsimile
mmccue@massattorneys.net
Pro Hac Vice

Aytan Y. Bellin, Esq. Bellin & Associates 85 Miles Avenue

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White Plains, New York 10606

Tel: (914) 358-5345

Email: aytan.bellin@bellinlaw.co

Anthony Paronich Broderick Law, P.C. 99 High St., Suite 304 Boston, MA 02110 (508) 221-1510 anthony@broderick-law.com Pro Hac Vice

Attorneys for Plaintiff and the proposed classes